



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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April 24, 2015

Mr. Carl Walker  
Wood's Hole, Martha's Vineyard and  
Nantucket Steamship Authority  
1 Railroad Ave  
Woods Hole, MA 02543

**RE: Fairhaven**  
Transmittal No.: X263855  
Application No.: SE-15-006  
Class: Submin  
FMF No.: 564841  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Carl Walker:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Air and Waste, has reviewed your Limited Plan Application ("Application") listed above. This Application concerns the proposed operation of boat maintenance activities at your Fairhaven Maintenance Facility located at 12-14 Main Street in Fairhaven, Massachusetts ("Facility").

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control," regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

## **1. DESCRIPTION OF FACILITY AND APPLICATION**

The Wood's Hole, Martha's Vineyard and Nantucket Steamship Authority ("the Permittee") provides transportation to the islands of Martha's Vineyard and Nantucket. The Fairhaven shipyard performs maintenance on the Steamship Authority's vessels, which includes painting. The bulk of the painting is done by hand, using brushes and rollers, but there may be a limited amount of spray painting.

Best Available Control Technology (BACT) will be achieved by limiting the volatile organic compound (VOC) content of the paints and other coatings in accordance with Table 2.

Additional activities at the Facility include grinding and scraping to prepare the surfaces prior to painting. These preparatory activities may generate particulate emissions, which have been determined to be exempt from Plan Approval as a de-minimis increase in emissions. Despite being exempt from Plan Approval, the Permittee has an obligation to ensure the preparatory activities do not create a condition of air pollution due to dust, odor, or noise or otherwise create a nuisance condition.

## **2. EMISSION UNIT (EU) IDENTIFICATION**

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

<b>Table 1</b>			
<b>EU#</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
1	marine vessel coating activities	undetermined	none

**Table 1 Key:**

EU# = Emission Unit Number

PCD = Pollution Control Device

## **3. APPLICABLE REQUIREMENTS**

### **A. OPERATIONAL, PRODUCTION and EMISSION LIMITS**

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2 below:

Table 2						
EU #	Operational / Production Limit			Air Contam- inant	Emission Limit <sup>1,2</sup>	
	1. Limit material usage such that HAP (single) emissions do not exceed the emissions limits listed herein.			HAP (single)	0.3 TPM	
					1.5 TPY	
	2. Limit material usage such that HAP (total) emissions do not exceed the emissions limits listed herein.			HAP (total)	0.5 TPM	
					3.1 TPY	
	3. Limit material usage such that VOC content and emissions do not exceed the emissions limits stated below and listed herein.			VOC	1.0 TPM  6.3 TPY	
	Coating Category	VOC Limits <sup>a,b</sup>				
		Grams/liter coating <sup>e</sup>	Grams/liter solids <sup>c</sup> T > 4.5 degrees C			Grams/liter solids <sup>c,d</sup> T < 4.5 degrees C
	General Use	340	571			728
	Specialty:					
	Air Flask	340	571			728
	Antenna	530	1439			
	Antifoulant	400	765			971
	Heat Resistant	420	841			1069
	High-gloss	420	841			1069
	High-temperature	500	1237			1597
	Inorganic Zinc High-build	340	571			728
	Military Exterior	340	571			728
	Mist	610	2235			
	Navigational Aids	550	1597			
	Nonskid	340	571			728
	Nuclear	420	841			1069
	Organic Zinc	360	630			802
	Pretreatment Wash Primer	780	11095			
	Repair and Maintenance of Thermoplastics	550	1597			
	Rubber Camouflage	340	571	728		
Sealant for Thermal Spray Aluminum	610	2235				
Special Marking	490	1178				
Speciality Interior	340	571	728			
Tack Coat	690	2235				
Undersea Weapons Systems	340	571	729			
Weld-through Precon. Primer	650	2885				

Table 2			
EU #	Operational / Production Limit	Air Contaminant	Emission Limit <sup>1,2</sup>
	a. The limits are expressed in two sets of equivalent units. Either grams per liter (g/L) or pounds per gallon (lb/gal), may be used to demonstrate compliance. b. To convert from g/L to lb/gal, multiply by (3.785 L/gal) (1 lb/453.6 lb/g) or 1/120. For compliance purposes, metric units define the standards. c. VOC limits expressed in units of mass of VOC per volume of solids were derived from the VOC limits expressed in units of mass of VOC per volume of coating assuming the coatings contain no water or exempt compounds and that the volumes of all components within a coating are additive. VOC does include exempt compounds listed as HAP. d. These limits apply during cold-weather time periods (i.e. temperatures below 4.5 Degrees Centigrade). Cold-weather allowances are not given to coatings in categories that permit less than 40 percent solids (nonvolatiles) content, by volume. Such coatings are subject to the same limits regardless of weather conditions. e. Minus water and exempt compounds.		

**Table 2 Key:**

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

HAP (single) = maximum single Hazardous Air Pollutant

HAP (total) = total Hazardous Air Pollutants

TPM = tons per month

TPY = tons per consecutive 12-month period

C = Centigrade

T = Temperature

≥ = greater than or equal to

< = less than

**Notes:**

1. Includes coatings applied with spray guns, brushes, and rollers.
2. The Permittee may reconcile VOC and HAP contained in any solvent waste shipped during the month when determining monthly emissions provided that verifiable records are maintained demonstrating the VOC and HAP content, and quantity present in the waste being shipped if reconciling monthly usage and emissions.

**B. COMPLIANCE DEMONSTRATION**

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
1	1. The Permittee shall monitor the use of solvents, thinners, and coatings, to include VOC and HAP used and emitted, in order to demonstrate compliance with operational and emission limits contained in Table 2.

<b>Table 3</b>	
<b>EU#</b>	<b>Monitoring and Testing Requirements</b>
	2. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	3. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13.

**Table 3 Key:**

EU# = Emission Unit Number

MassDEP = Massachusetts Department of Environmental Protection

USEPA = United States Environmental Protection Agency

CMR = Code of Massachusetts Regulations

VOC = Volatile Organic Compounds

HAP = Hazardous Air Pollutants

<b>Table 4</b>	
<b>EU#</b>	<b>Record Keeping Requirements</b>
1	<p>1. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15<sup>th</sup> day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at <a href="http://www.mass.gov/dep/air/approvals/aqforms.htm#report">http://www.mass.gov/dep/air/approvals/aqforms.htm#report</a> .</p> <p>2. The Permittee may reconcile VOC and HAP contained in any solvent waste shipped during the month when determining monthly emissions provided that verifiable records are maintained demonstrating the VOC and HAP content, and quantity present in the waste being shipped if reconciling monthly usage and emissions.</p> <p>3. The Permittee shall maintain records of monitoring and testing as required by Table 3.</p> <p>4. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.</p> <p>5. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.</p>

<b>Table 4</b>	
<b>EU#</b>	<b>Record Keeping Requirements</b>
	6. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	7. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	8. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	9. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

**Table 4 Key:**

EU# = Emission Unit Number

PCD = Pollution Control Device

SOMP = Standard Operating and Maintenance Procedure

MassDEP = Massachusetts Department of Environmental Protection

USEPA = United States Environmental Protection Agency

<b>Table 5</b>	
<b>EU#</b>	<b>Reporting Requirements</b>
1	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Southeastern Regional Office of MassDEP, BAW Compliance and Enforcement Chief by telephone 508-946-2817, email, <a href="mailto:sero.air@state.ma.us">sero.air@state.ma.us</a> or fax 508-947-6557, as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Compliance and Enforcement Chief at MassDEP within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall report to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.
	4. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.

<b>Table 5</b>	
<b>EU#</b>	<b>Reporting Requirements</b>
	5. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	6. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

**Table 5 Key:**

EU# = Emission Unit Number

MassDEP = Massachusetts department of Environmental Protection

CMR = Code of Massachusetts Regulations

BAW = Bureau of Air and Waste

#### **4. SPECIAL TERMS AND CONDITIONS**

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

<b>Table 6</b>	
<b>EU#</b>	<b>Special Terms and Conditions</b>
1	1. All coatings used at the Facility shall comply with the as-applied formulations contained in Table 2. Notwithstanding the previous statement, any coatings used in small amounts at the facility are exempt from the emission limitations contained in Table 2, provided: <ul style="list-style-type: none"> <li>a) the total amount of all coatings exempted does not exceed 55 gallons during any rolling 12 month period at the facility; and,</li> <li>b) the facility identifies and tracks the usage of the coatings covered by this exemption</li> </ul>

**Table 6 Key:**

EU# = Emission Unit Number

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not

limited to rain protection devices known as “shanty caps” and “egg beaters.” The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

<b>Table 7</b>				
<b>EU#</b>	<b>Stack Height Above Ground (feet)</b>	<b>Stack Inside Exit Dimensions</b>	<b>Stack Gas Exit Velocity Range (feet per second)</b>	<b>Stack Gas Exit Temperature Range (°F)</b>
1	N/A	N/A	N/A	ambient

**Table 7 Key:**

EU# = Emission Unit Number

°F = Degree Fahrenheit

N/A = not applicable

## **5. GENERAL CONDITIONS**

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.



- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

## **6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT**

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

## **7. APPEAL PROCESS**

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact the undersigned by telephone at 508-946-2824, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the  
Department of Environmental Protection. A signed copy of this document  
is on file at the DEP office listed on the letterhead.

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Thomas Cushing  
Permit Chief  
Bureau of Air and Waste

Enclosure

ecc: Fairhaven Board of Health  
Fairhaven Fire Department  
MassDEP/Boston - Yi Tian  
MassDEP/SERO – M. Pinaud  
L. Black  
GZA GeoEnvironmental, Inc.  
Attn: K. Boivih